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Life Insurance Company

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

BRIAN C. TANKO, Ltd; BRIAN  
TANKO, and VICTORIA TANKO,

Plaintiffs,

v.

PACIFIC LIFE INSURANCE  
COMPANY; CBZ RETIREMENT  
SOLUTIONS, LLC; CORY ZIMET;  
ECONOMIC CONCEPTS, INC.;  
ECI PENSION SERVICES, LLC;  
MEDALIST PENSION ADVISORS,  
LLC; PENSION STRATEGIES, IBP,  
LLC, and KENNETH R.  
HARSTEIN,

Defendants

CASE NO: 2:11-cv-02073-GMN-GWF

**DEFENDANTS' JOINT UNOPPOSED  
MOTION FOR EXTENSION OF TIME  
TO RESPOND TO COMPLAINT**

**(FOURTH REQUEST)**

Defendants move the Court for an extension of time to respond to Plaintiffs' complaint up to and including March 29, 2012 pursuant to LR 6-1. The parties are diligently working to reach an early resolution of this dispute. As such, this is the fourth extension requested concerning this

1 matter. There will not be another request for an extension of time in which  
2 to respond to the Complaint. Plaintiffs' counsel has informed Pacific Life's  
3 counsel that there is no opposition to this request and that it would extend  
4 to the other served defendants to this cause.

5 On November 14, 2011, Plaintiffs commenced this action by  
6 filing a complaint in the Eighth Judicial District Court, Clark County,  
7 Nevada. On December 22, 2011, Pacific Life removed this action to federal  
8 court and all other defendants consented to the removal. The parties have  
9 since conferred in good faith and are presently discussing the potential for  
10 an early resolution of this matter.

11 This request for an extension is made in good faith and not  
12 made for the purpose of undue delay. Therefore, the Defendants  
13 respectfully requests that the Court grant its motion.

14 Respectfully submitted:

15 MORRIS LAW GROUP

LOVAAS & LEHTINEN, P.C.

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21 WILSON ELSE


22 By: /s/ David Kahn  
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25 Attorney for Defendants Economic  
26 Concepts, Inc.; ECI Pension Services,  
27 LLC; Medalist Pension Advisors, LLC  
28 and Kenneth R. Harstein

ORDER

It is so ordered. All served Defendants shall have up to and including March 29, 2012 to answer or otherwise respond to the Complaint.

Dated: March 16, 2012.

  
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GEORGE FOLEY, JR.  
United States Magistrate Judge

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